

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

REBECCA TERRY,

Plaintiff,

Case No. 17-CV-1112

v.

COUNTY OF MILWAUKEE, et al.,

Defendants.

**DEFENDANTS MILWAUKEE COUNTY, CLARKE, WENZEL, EXUM, BEVENUE AND
HOOVER’S SUPPLEMENTAL RESPONSES TO PLAINTIFF’S FIRST SET OF
INTERROGATORIES**

Defendants Milwaukee County, David A. Clarke, Jr., Brian Wenzel, Carolyn Exum, Morgan Bevenue and Margaret Hoover respond to *Plaintiff’s First Set of Interrogatories to County Defendants and Healthcare Defendants* as follows:

GENERAL OBJECTIONS

Defendants generally object to the extent these requests call for information protected by the attorney client privilege or work product doctrine and will produce a privilege log if materials are withheld pursuant to these or any other legal privileges. Defendants reserve the right to supplement this and any other discovery response as issues raised in the litigation become more defined and/or as more information becomes available during the course of discovery. Defendants further object to each of Plaintiff’s “Definitions” to the extent that they purport to impose obligations beyond those provided for under the applicable procedural rules.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 12. Please identify the policymaker(s) with final policymaking authority for the Milwaukee County Jail's policies and practices relating to:

- a. Access of inmates to medical care at Milwaukee County Jail;
- b. Provision of medical care at Milwaukee County Jail;
- c. Communication and coordination between jail staff and medical staff at Milwaukee County Jail;
- d. Access of inmates to medical care outside of Milwaukee County Jail;
- e. Staffing of medical personnel at the Milwaukee County Jail; and
- f. Shackling inmates during hospitalization.

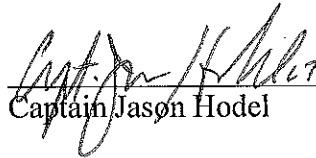
RESPONSE: *Object to the request as vague, overly broad and seeking a legal opinion or conclusion. Further object to the extent that the request assumes that all of the topics listed pertain to policies or established practices rather than individual discretion. Subject to the objections, final authority for the operation of the Milwaukee County Jail generally lies with the Office of the Sheriff and the Milwaukee County Board of Supervisors. Certain aspects of Jail operations were delegated by a Health Services Agreement entered into by Milwaukee County and Armor Correctional Health Services, Inc., effective May 11, 2013. The Agreement is produced herewith. Responsibility for some medical "policies and practices" was delegated pursuant to the terms of the Agreement.*

SUPPLEMENTAL RESPONSE DATED 4/17/18: *Subject to the above objections and without waiving the same: in March 2014 Inspector Edward Bailey had final policymaking authority for the subject matter identified in Interrogatory No. 12 (a)-(f), supra.*

VERIFICATION

On behalf the County of Milwaukee Defendants, and in my capacity at the Milwaukee County Jail, I have read the Supplemental Responses to Plaintiff Rebecca Terry's First Interrogatories, which are based on a diligent and reasonable effort by me to obtain information currently available. I reserve the right to make changes in or additions to any of these answers if it appears at any time that errors or omissions have been made or if more accurate or complete information becomes available. Subject to these limitations, these Responses are true to the best of my present knowledge, information, and belief.

Subscribed and sworn to under the pains and penalties of perjury this 17 day of April, 2017.



Captain Jason Hodel

AS TO OBJECTIONS:

Dated this 17th day of April, 2018.

LEIB KNOTT GAYNOR LLC

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